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November 9, 2007

Via Facsimile: (212) 805-7906

Hon. Denny Chin  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

## MEMO ENDORSED

Re: Ocean Lines Holding Ltd. v. China National Chartering Corp.  
U.S.D.C., S.D.N.Y. Docket No.: 07 Civ. 8123 (DC)  
LML ref: 1212

Dear Judge Chin:

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 11/9/2007

We are counsel for Defendant, China National Chartering Corporation, (hereinafter "Sinochart"), in the above-captioned matter. As your Honor is aware, Sinochart has filed a motion to vacate the maritime attachment of its property pursuant to the September 20, 2007 Ex Parte Order. The basis for the Motion is that the Sinochart is entitled to the protections and immunities of the U.S. Foreign Sovereign Immunities Act, 28 U.S.C. § 1600 *et seq.*, as it is a corporation 100% owned by the People's Republic of China and, therefore, qualifies as an "instrumentality" under the FSIA.

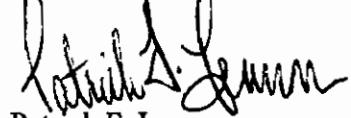
On November 1, 2007 Plaintiff, Ocean Lines Holding Ltd., filed its opposition papers to the Motion, which included a Memorandum of Law and five witness affidavits/declarations (four expert) comprising several hundred pages of evidence. Under the original briefing scheduled agreed between the parties, Sinochart's reply papers are due today, i.e. November 9, 2007. Given the magnitude and volume of Ocean Lines' opposition papers, however, and the need for us to coordinate with Sinochart and its experts in the People's Republic of China, we have requested the consent of Ocean Lines' counsel to an extension of time until November 23, 2007 for Sinochart to submit its reply papers. Ocean Lines' counsel has graciously consented to this request.

In view of the foregoing, we respectfully request the Court's endorsement of this letter extending Sinochart's time until November 23, 2007 to file reply papers on the Motion to Vacate.

*Approved.  
So ORDERED.  
RJL  
wsds 11/9/07*

Hon. Denny Chin  
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Respectfully submitted,



Patrick F. Lennon

PFL/bhs

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